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March 12, 2020

Via Electronic Filing

The Honorable Judge Alison J. Nathan
U.S. District Court, Southern District of New York
40 Foley Square
New York, NY 10007

Re: *De La Rosa v. Aspenly Co. LLC et al*
Case No.: 18-cv-03456

Dear Honorable Judge Nathan:

This law firm represents Defendant Pure Green NYC 8th Street Corp. (the “**Defendant**”) in the above-referenced action.

Pursuant to Your Honor’s Individual Motion Practice Rules 1(A), this letter respectfully serves to address Plaintiff’s March 12, 2020 letter [Dckt. No. 93].

As noted in my communications to Plaintiff’s counsel on March 11, 2020, that submission of a Joint Pre-Trial Report at this time was premature, in light of the outstanding discovery issues. [See Dckt. Nos. 83, 86, 91].

Plaintiff’s counsel ignored the undersigned’s communication, and instead, unilaterally filed it’s own pre-trial submissions.

A second, independent issue, also warrants attention. The undersigned’s law firm has temporarily suspended operations due to concerns arising out of the COVID-19 virus (coronavirus). The undersigned is in the process of relocating to a remote work location. Accordingly, the undersigned was unable to prepare a letter motion addressing this issue to Your Honor sooner.

Out of an abundance of caution, this letter also respectfully serves to request an extension of the deadline to file the Joint Pre-Trial Report from March 12, 2020, *sine die*, pending the resolution of the discovery issues raised in Dckt. No. 83.

This is the first request for an extension of time to file the Joint Pre-Trial Report, and is not made on consent of Plaintiff. This request is being made less than forty-eight (48) hours prior to the scheduled deadline, due to the extenuating circumstances described above.

In light of the foregoing, Defendant respectfully requests that the Joint Pre-Trial Report submission deadline be extended from March 12, 2020, *sine die*, pending the resolution of the discovery issues raised in Dckt. No. 83.

Thank you, in advance, for your time and consideration.

Respectfully submitted,
LEVIN-EPSTEIN & ASSOCIATES, P.C.

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VIA ECF: All Counsel